REMARKS

The Office Action of February 14, 2006 was received and reviewed. The Examiner is thanked for reviewing this application.

Claims 1-4 are pending for consideration, of which claim 1 is independent.

Referring now to the detailed Office Action, claims 1-4 stand rejected under 35 U.S.C. §101 as directed to non-statutory subject matter. The Examiner asserts that the claims are considered to be an abstract representation or software which do not meet the standard set forth in the State Street Bank case of being tangible, useful, and concrete. In response, Applicants have amended the claims, as shown above, to further clarify the present invention. Further, as discussed in the specification, the presently claimed invention is a method which allows one to manipulate text on a computer. Hence, the claimed invention is tangible. More specifically, the presently claimed invention allows a user to compose or edit text in a computer program that has hierarchical structure, such as C programming language, on a computer with relative ease. Moreover, the method of the present invention relates a conventional outline processor but with graphical interfaces based on an inverted tree structure to facilitate the manipulation and viewing of frames or blocks of source codes in a text file containing a program. Thus, the claimed invention is useful and concrete to a programmer, inasmuch as a word processor or an outline processor is useful and concrete to a writer who uses a computer to compose and edit his or her ideas and thoughts. Accordingly, the presently claimed invention meets the requirement of being tangible, useful and concrete, and the rejection is respectfully requested to be reconsidered and withdrawn.

Claims 1-4 stand rejected under 35 U.S.C. §103(a) as unpatentable over Cross II et al. ("Control Structure Diagrams for Ada 95", 1996 – hereafter Cross II) in view of Hendrix et al. ("Visual Support for Incremental Abstraction and Refinement in Ada 95", 1998 – hereafter Hendrix). Finally, claim 4 stands rejected under 35 U.S.C. §103(a) as unpatentable over Cross II in view of Beaudouin-Lafon ("Novel Interaction Techniques for Overlapping Windows", 2001 – hereafter Beaudouin-Lafon). These rejections are respectfully traversed at least for the reasons provided below.

In the rejection of claims 1-4 over Cross II and Hendrix, the Examiner interprets Control Structure Diagrams (CSD's) of Cross II to be equivalent to Applicant's "outlines" and the CSD box symbols as shown in Fig. 5 of Cross II as equivalent to Applicant's frames.

The Examiner then states that Cross II does not teach an outline-processor that has diagram displays that connect the frames by a line, wherein if the inside of a frame is clicked by a mouse, a source of the program therein is outline-displayed. The Examiner then applied Hendrix and alleges that Hendrix do teach an outline processor that has diagram-displays that connect the frames by a line as shown in Fig. 2.

In response to the Examiner's interpretation of Cross II and Hendrix, Applicant respectfully submits that neither Cross II nor Hendrix teach, discloses or suggest a graphical presentation of a program shown as a plurality of outline-display frames (101, 103, 105) connected by lines forming a hierarchical structure, as recited in amended claim 1.

Applicants respectfully invites the Examiner study Fig. 1, for example, of the Applicant's specification which shows a diagram with block 101 containing a main program on top of a hierarchical structure with two sub-programs 103 and 105 at a lower level and are connected to block 101. The features of claim 1 are supported by, e.g., Fig. 1.

In contrast with claim 1 and the illustration in Applicant's Fig. 1, Hendrix's Fig. 2 merely shows multi-level or nested loops identified by vertical lines identifying each nested level of nested loops and a CSD unit symbol identifying a routine or a functional module. That is, the source codes shown in Hendrix are made easier to read by using CSD's to label and show structural and control information for each module and to allow control structures, such as loops, to be selectively displayed by hiding or folding portions of nested loops thereby improving the readability of a long program. There is no suggestion or motivation in Hendrix for a diagram-display having a plurality of outline-display frames connected by lines in a hierarchical structure as recited in amended claim 1.

Further, Hendrix only shows that source codes or modules of source codes are displayed or listed in a sequential manner. That is, Hendrix does not teach, disclose or suggest a hierarchical diagram of a program such as shown in Applicant's Fig. 1 or recited in claim 1 of the present invention. For example, Hendrix method does not and cannot show block or frame 105 connected to a higher level block or frame 101 as shown in Fig. 1 of Applicant's disclosure. Likewise, Hendrix does not and cannot show block or frame 103 connected to block or frame 101.

Contrary to the Examiner's assertion that Hendrix teaches lines connecting frames, it appears that Fig. 2 of Hendrix cited by the Examiner only shows lines indicating various levels in nested loops and lines, CSD box symbols and unit symbols identifying lines or

blocks of source codes. Clearly, these lines of Hendrix are not equivalent to lines connecting various frames in a hierarchical structure of a program in Applicant's claimed invention. Similar observations regarding Hendrix can also be made in regard to the Cross II reference.

The arguments set forth above with respect to claim 1 are also applicable to the rejection of claims 2-4 over Cross II and Hendrix.

With respect to claim 2, neither Hendrix nor Cross II teach, disclose or suggest an argument frame displayed in vicinity of a respective frame in a displayed program hierarchical structure, as amended in claim 2. Applicant respectfully asserts that Fig. 2 of Cross does not show any box/block/frame, if the module of source code in Fig. 2 is considered as equivalent to Applicant's frame.

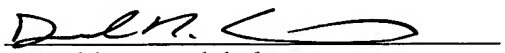
With respect to the rejection of claim 3, the Examiner alleges that Fig. 3 of Hendrix teaches changing thickness of frame line before and after expansion. However, Fig. 3 of Hendrix merely shows an example of a CSD folding symbol, and there is no relation between Fig. 3 and Fig. 6 showing the changing in thickness of any lines.

With respect to the rejection of claim 4, The arguments set forth above with respect to the rejection of claims 1-4 over Cross II and Hendrix are also applicable to the rejection of claim 4 over Cross II and Beaudouin-Lafon. Beaudouin-Lafon does not teach, disclose or suggest displaying a most recently activated expanded view of the respective outline-display frame on top of other expanded views of outline-display frames, as recited in amended claim 4. Further, Beaudouin-Lafon does not teach, disclose or suggest a graphical presentation of a program shown as a plurality of outline-display frames connected by lines forming a hierarchical structure. Hence, Beaudouin-Lafon cannot cure the deficiencies of Hendrix.

The requirements for establishing a *prima facie* case of obviousness, as detailed in MPEP § 2143 - 2143.03 (pages 2100-122 - 2100-136), are: first, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference to combine the teachings; second, there must be a reasonable expectation of success; and, finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. As Cross II, Hendrix and Beaudouin-LaFon are deficient as discussed above, their combination in the pending §103(a) rejections is improper.

In view of the arguments and amendments set forth above, Applicant respectfully requests reconsideration and withdrawal of the pending rejections, and that the application be passed to issue. If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone the undersigned to arrange such a conference.

Respectfully submitted,



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